

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**In Re:** ) **19-02335**  
 )  
**STACY BERTRAND,** ) **Chapter 13**  
 )  
**Debtor(s).** ) **Hon. Judge: DOYLE**

**NOTICE OF MOTION**

*To the following persons or entities who have been served via electronic mail:*  
U.S. Bankruptcy Trustee: [USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)  
Tom Vaughn, Chapter 13 Trustee: [bndege@tvch13.net](mailto:bndege@tvch13.net); [lmccray@tvch13.net](mailto:lmccray@tvch13.net)

*To the following persons or entities who have been served via U.S. Mail:*  
See attached list.

Please take notice that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in their stead at **219 S. Dearborn Street, Chicago, IL 60604**, and in the following courtroom (or any other place posted), and present the attached **Motion to Modify Plan**, at which time and place you may appear.

Judge: DOYLE  
Court: 742  
Date: August 20, 2019  
Time: 9:30 a.m.

**PROOF OF SERVICE**

A copy of this Notice of Motion and attachments were deposited at the United States Post Office, Wheeling, Illinois, 60090, with sufficient postage prepaid, by Michael R. Colter, II, or served electronically by the bankruptcy court, under oath and under all penalties of perjury.

DATE OF SERVICE: July 23, 2019

/s/ Michael R. Colter, II  
Michael R. Colter, II, A.R.D.C. #6304675  
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES  
790 Chaddick Drive  
Wheeling, IL 60090  
847/520-8100

*To the following persons or entities who have been served via U.S. Mail:*

Stacy Bertrand  
1501 S. Wolf Road, #451  
Prospect Heights, IL 60070

Becket and Lee LLP  
PO Box 3001  
Malvern PA 19355-0701

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4515 N Santa Fe Ave  
Oklahoma City, OK 73118

CEP America Illinois, LLP  
Wakefield and Assoc.,  
P.O. Box 50250  
Knoxville, TN 37950-0250

Commonwealth Edison Company  
Bankruptcy Department  
1919 Swift Drive  
Oak Brook, IL 60523

Illinois Dept Rev. Bankruptcy Section  
PO Box 19035  
Springfield, IL 62794-9035

Illinois Lending Corp.  
701 Lee Street, Suite 570  
Des Plaines, IL 60016

IRS  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

LVNV Funding, LLC  
Resurgent Capital Services  
P.O. Box 10587  
Greenville, SC 29603-0587

U.S. Department of Education  
c/o FedLoan Servicing  
P.O. Box 69184  
Harrisburg, PA 17106-9184

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<b>In Re:</b>	)	19-02335
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<b>STACY BERTRAND,</b>	)	<b>Chapter 13</b>
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<b>Debtor(s).</b>	)	<b>Hon. Judge: DOYLE</b>

**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, **STACY BERTRAND**, by and through her attorneys, David M. Siegel & Assoc., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois Eastern Division.
- 2) Debtor filed a petition on January 28, 2019, for relief under Chapter 13 of Title 11 USC.
- 3) The confirmed plan requires payments of \$350.00, per month with General Unsecured Creditors receiving not less than 10% of allowed claims.
- 4) Debtor began maternity leave on June 6, 2019, and is being paid substantially less during this period. Debtor's gross income while on maternity leave is \$1,681.59 per month. This makes it extremely difficult to pay basic expenses.
- 5) Debtor requests that payroll deductions cease until October 1, 2019.
- 6) Debtor will return to work October 1, 2019, and proposes to modify her plan payment under 11 U.S.C. § 1329, \$400.00 per month beginning with the October 2019 payment.
- 7) The Debtor also seeks to modify her plan under 11 U.S.C. § 1329 and defer the default that has accrued and will continue to accrue until she returns to work in October 2019.

- 8) General Unsecured Creditors will continue to receive no less than 10% of their allowed claims.
- 9) Debtor proposes this modification in good faith and with the intent to continue paying her creditors while being able to afford to basic expenses while she is on maternity leave.

WHEREFORE, the Debtor, **STACY BERTRAND**, prays that this Honorable Court enter an Order to Modify the Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II

Michael R. Colter, II, A.R.D.C. #6304675  
Attorney for the Debtor

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790 Chaddick Drive  
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